

Facility Name: **Southern Veneer Products**
City: Fitzgerald
County: Ben Hill
AIRS #: 04-13-017-00031

Application #: TV-522982
Date Application Received: January 29, 2021
Permit No: 2436-017-0031-V-05-0

Program	Review Engineers	Review Managers
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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Southern Veneer Products

2. Parent/Holding Company Name

Veneer Products Acquisition, LLC

3. Previous and/or Other Name(s)

Fitzgerald Forest Products
Springfield Forest Products

4. Facility Location

240 Peachtree Road
Fitzgerald, Georgia 31750, Ben Hill County

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area for all pollutants.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on the "Permit" file(s) on the facility found in the Air Branch office and online database.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2436-017-0031-V-04-0	August 1, 2016	Title V renewal permit.

D. Process Description

1. SIC Codes(s)

2436, Softwood Veneer and Plywood

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures plywood and veneer finished products.

3. Overall Facility Process Description

The facility receives raw logs that are first debarked and cut into blocks. The logs are then placed in a steam vat to soften the wood and then placed in a lathe that peels the logs into green veneer. Usable veneer is dried in one of three natural gas, direct fired dryers (Source Codes DR01, DR02, and DR03). The majority of this dried veneer is sold as product. The remainder is sent to the layout line, where it is composed with glue and then pressed by a hot press (Source Code PR01) into panels. The panels are then sent to plywood saws to be cut into finished dimensions. A regenerative thermal oxidizer (Source Code RTO1) controls the exhaust from dryers 1 and 2. A second regenerative thermal oxidizer (Source Code RTO2) controls the exhaust from dryer 3. Emissions from the 44-opening platen press (Source Code PR01) are uncontrolled. Three natural gas fired boilers (Source Codes BOI2, BOI3, and BOI4) provide the heat for the vat and the press.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a minor source under PSD/NSR regulations. Potential emissions of all criteria pollutants are less than 250 tons per year.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
PM _{2.5}	✓	✓		
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓	✓		
TRS	n/a			
H ₂ S	n/a			
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

D. Permit Conditions

None applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
BOI2	Steam Boiler 2 (11.8 MMBTU/hr)	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
BOI3	Steam Boiler 3 (11.8 MMBTU/hr)	40 CFR 60 Subpart A 40 CFR 60 Subpart Dc 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
BOI4	Steam Boiler 4 (9.9 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	None	None
DR01	Veneer Dryer 1 (24 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RTO1	Regenerative Thermal Oxidizer 1
DR02	Veneer Dryer 2 (24 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RTO1	Regenerative Thermal Oxidizer 1
DR03	Veneer Dryer 3 (55 MMBTU/hr)	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	RTO2	Regenerative Thermal Oxidizer 2
PR01	Plywood Press	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	None	None

B. Equipment & Rule Applicability

Steam Boilers 2 and 3 (Source Codes BOI2 and BOI3)

Steam Boiler 2 and Steam Boiler 3 were both installed in 2003 and each is rated at 11.8 MMBtu/hr. The units are permitted to burn natural gas and are not equipped with a control device. The applicable rules and regulations are summarized below:

Federal

- 40 CFR 60 Subpart Dc – *Standard of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. Each boiler was constructed after June 9, 1989 and has a heat input capacity equal to or less than 100 MMBtu/hr but equal to or greater than 10 MMBtu/hr. The regulatory analysis is as follows:
 - SO₂ – The boiler burns natural gas; therefore, it is not subject to a SO₂ limit.
 - PM – The boiler burns natural gas; therefore, it is not subject to a PM limit.
 - Opacity – The boiler burns natural gas; therefore, it is not subject to an opacity limit.

No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

- 40 CFR 63 Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. Each boiler is subject to a one-time energy assessment and to periodic tune-ups under the regulation. Neither boiler is subject to any emission limits because both burn only natural gas. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

State

- Georgia Rule 391-3-1-.02(2)(d) – *Fuel-burning Equipment*. Each boiler was constructed after January 1, 1972 and has a heat input capacity greater than 10 MMBtu/hr but less than 250 MMBtu/hr. The PM emissions from each boiler are limited to $0.5(10/R)^{0.5}$ lb/MMBtu heat input, where R is equal to the heat input rate of 11.8 MMBtu/hr. For both Steam Boiler 2 and 3, the calculated PM emission limit based on this rule is 0.460 lb/hr each.

Georgia Rule (d) also limits the opacity from each boiler to less than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Neither boiler is subject to a NO_x limit under Georgia Rule (d) because each boiler's heat input capacity is less than 250 MMBtu/hr.

No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

- Georgia Rule 391-3-1-.02(2)(g) – *Sulfur Dioxide*. Each boiler was constructed after January 1, 1972 and fires fossil fuels at a rate less than 100 MMBtu/hr. Georgia Rule (g) limits the amount of sulfur in the fuel for sources having a heat input rate less than 100 MMBtu/hr to 2.5 percent, by weight.

Neither boiler is subject to SO₂ limits under Georgia Rule (g) because fossil fuel combustion is less than 250 MMBtu/hr for the unit.

No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

Other

- The permit specifies that the boilers can burn no fuel other than natural gas. This condition was added to the permit prior to the most recent renewal to minimize the applicability of 40 CFR 63 Subpart DDDDD's 2015 major rule update.

Steam Boiler 4 (Source Code BOI4)

Steam Boiler 4 was installed in 2012 and is rated at 9.9 MMBtu/hr. The unit is permitted to burn natural gas and is not equipped with a control device. The applicable rules and regulations are summarized below:

Federal

- 40 CFR 63 Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*. The boiler is subject to a one-time energy assessment and to periodic tune-ups under the regulation. The boiler is not subject to any emission limits because it burns only natural gas. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

State

- Georgia Rule 391-3-1-.02(2)(d) – *Fuel-burning Equipment*. The boiler was constructed after January 1, 1972 and has a heat input capacity less than 10 MMBtu/hr. The PM emissions from Steam Boiler 4 are limited to 0.5 lb/MMBtu heat input.

Georgia Rule (d) also limits the opacity from the boiler to less than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

The boiler is not subject to a NO_x limit under Georgia Rule (d) because the boiler's heat input capacity is less than 250 MMBtu/hr.

No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

- Georgia Rule 391-3-1-.02(2)(g) – *Sulfur Dioxide*. The boiler was constructed after January 1, 1972 and fires fossil fuels at a rate less than 100 MMBtu/hr. Georgia Rule (g) limits the amount of sulfur in the fuel for sources having a heat input rate less than 100 MMBtu/hr to 2.5 percent, by weight.

The boiler is not subject to SO₂ limits under Georgia Rule (g) because fossil fuel combustion is less than 250 MMBtu/hr for the unit.

No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

Other

- The permit specifies that the boiler can burn no fuel other than natural gas. This condition was added to the permit prior to the most recent renewal to minimize the applicability of 40 CFR 63 Subpart DDDDD's 2015 major rule update.

Veneer Dryers 1, 2, and 3 (Source Codes DR01, DR02 and DR03)

Veneer Dryers 1 and 2 (Source Code DR01 and DR02) were installed in 1993. Each dryer is equipped with natural gas burners totaling at 24 MMBtu/hr per dryer. Dryers 1 and 2 vent to Regenerative Thermal Oxidizer 1 (Source Code RTO1). Veneer Dryer 3 (Source Code DR03) was installed in 2016 and is equipped with natural gas burners totaling 55 MMBtu/hr. Dryer 3 vents to Regenerative Thermal Oxidizer 2 (Source Code RTO2). The applicable rules and regulations are summarized below:

Federal

- 40 CFR 63 Subpart DDDD – *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*. All three veneer dryers are subject to the following requirements:
 - Use the regenerative thermal oxidizer to reduce total HAP by 90 percent or more.
 - Maintain the average firebox temperatures of the RTOs at the established temperature.
 - Operate as established in the permit except during times of startup, shutdown, malfunction or specific exemption.
 - Maintain a written Work Practice Implementation Plan to minimize fugitive emissions from the dryer green end heated zone and the dryer doors.
 - Use non-HAP coatings as defined in the subpart.

This rule has been updated since the facility's last permit renewal in 2016. The rule update finalized in August 2020 removed the exception that the facility can be out of compliance during times of startup, shutdown, malfunction or specific exemption and removed the requirement for an SSMP, both beginning August 13, 2021. The permit has been updated accordingly.

State

- Georgia Rule 391-3-1-.02(2)(b) – *Visible Emissions*. Georgia Rule (b) limits the opacity of emissions from any source to less than 40 percent. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.
- Georgia Rule 391-3-1-.02(2)(e) – *Particulate Emissions from Manufacturing Processes*. Georgia Rule (e) limits PM emissions from manufacturing processes based on the input rate to the processing equipment. The equation for calculating the limit is included in the permit. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.
- Georgia Rule 391-3-1-.02(2)(g) – *Sulfur Dioxide*. Georgia Rule (g) limits the amount of sulfur in the fuel for sources having a heat input rate less than 100 MMBtu/hr to 2.5 percent, by weight. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

Other

- The permit specifies that the dryers can burn no fuel other than natural gas. This condition was added to the permit prior to the most recent renewal as part of a decision to remove all references to distillate oil.

Plywood Press (Source Code PR01)

The Plywood Press was installed in 2004. It is not equipped with a control device. The applicable rules and regulations are summarized below:

Federal

- 40 CFR 63 Subpart DDDD – *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*. The press is required to use non-HAP coatings as defined in the subpart. Although this rule has been updated since the facility's last permit renewal in 2016, none of the updates are specifically applicable to the press. Therefore, no updates to the permit regarding this subpart are required.

State

- Georgia Rule 391-3-1-.02(2)(b) – *Visible Emissions*. Georgia Rule (b) limits the opacity of emissions from any source to less than 40 percent. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

- Georgia Rule 391-3-1-.02(2)(e) – *Particulate Emissions from Manufacturing Processes*. Georgia Rule (e) limits PM emissions from manufacturing processes based on the input rate to the processing equipment. The equation for calculating the limit is included in the permit. No updates to this rule have occurred since the facility's last permit renewal in 2016; therefore, no updates to the permit regarding this subpart are required.

C. Permit Conditions

No permit amendments have been made since the last Title V renewal permit was issued on August 1, 2016 as Permit No. 2436-017-0031-V-04-0. As such, all of the permit conditions listed below were listed in that permit unless otherwise stated.

Equipment Emission Caps and Operating Limits

None.

Equipment Federal Rule Standards

40 CFR 60 Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units

Condition 3.3.1 is the general applicability statement for 40 CFR 60 Subpart Dc.

40 CFR 63 Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Condition 3.3.2 is the general applicability statement for 40 CFR 63 Subpart DDDDD.

Condition 3.3.3 specifies the tune-up requirements for the boilers under 40 CFR 63 Subpart DDDDD.

Condition 3.3.4 specifies the reoccurring tune-up requirements for the boilers under 40 CFR 63 Subpart DDDDD. The permit condition has been revised to be more specific to the facility and to add clarity on the specific schedule for each permitted boiler.

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

Condition 3.3.5 is the general applicability statement for 40 CFR 63 Subpart DDDD.

Condition 3.3.6 requires the veneer dryers to use RTOs to reduce total HAP under 40 CFR 63 Subpart DDDD.

Condition 3.3.7 requires the RTOs to maintain their average firebox temperatures at the established temperature under 40 CFR 63 Subpart DDDD.

Condition 3.3.8 is a new permit condition which took effect beginning August 13, 2021. It is essentially a modified replacement condition for Previous Permit Condition 3.3.9, which becomes ineffective that same day. The condition has been added as part of the updates required by the August 2020 regulation update of Subpart DDDD.

Condition 3.3.9 requires the facility to maintain a written Work Practice Implementation Plan to minimize fugitive emissions from the dryer green end heated zone and the dryer doors under 40 CFR 63 Subpart DDDD.

Condition 3.3.10 requires the facility to use non-HAP coatings as defined in 40 CFR 63 Subpart DDDD.

Condition 3.3.11 is a new permit condition which took effect beginning August 13, 2021. It specifies the procedures that should be taken by the Permittee during safety-related shutdowns. The condition has been added as part of the updates required by the August 2020 regulation update of Subpart DDDD.

Condition 3.3.12 is a new permit condition which took effect beginning August 13, 2021. It specifies the procedures that should be taken by the Permittee during startup or shutdown of any of the veneer dryers. The condition has been added as part of the updates required by the August 2020 regulation update of Subpart DDDD.

Equipment SIP Rule Standards

Condition 3.4.1 specifies that the facility can burn only natural gas in the boilers.

Condition 3.4.2 is the PM and opacity limits for Steam Boilers 2 and 3 under Georgia Rule (d).

Condition 3.4.3 is the PM and opacity limits for Steam Boiler 4 under Georgia Rule (d).

Condition 3.4.4 contains the fuel sulfur limit for the boilers under Georgia Rule (g).

Condition 3.4.5 specifies that the facility can burn only natural gas in the veneer dryers.

Condition 3.4.6 is the opacity limit for the veneer dryers under Georgia Rule (b).

Condition 3.4.7 is the PM limit for the veneer dryers under Georgia Rules (e).

Condition 3.4.8 specifies the fuel sulfur limit for the veneer dryers under Georgia Rule (g).

Condition 3.4.9 is the opacity limit for the plywood press under Georgia Rule (b).

Condition 3.4.10 is the PM limit for the plywood press under Georgia Rules (e).

Conditions Removed From the Permit

Previous Permit Condition 3.3.3 was removed from this Renewal Permit. This condition specified the tune-up and one-time energy assessment requirements for the boilers under 40 CFR 63 Subpart DDDDD. The conditions were double listed in the permit. The one-time energy assessment requirements were met in 2017 and are therefore being removed from this permit altogether, and the tune-up requirements in this permit condition were the same as required in Previous Permit Condition 3.3.8. The rule references for Condition 3.3.4 (Previous Permit Condition 3.3.8) were updated to include those listed in this previous permit condition.

Previous Permit Condition 3.3.4 was removed from this Renewal Permit. This condition specified the one-time energy assessment requirements for the boilers under 40 CFR 63 Subpart DDDDD. The one-time energy assessment requirements were met in 2017 and are therefore being removed from this permit altogether.

Previous Permit Condition 3.3.5 was removed from this Renewal Permit. This condition specified the initial tune-up requirements for two of the boilers under 40 CFR 63 Subpart DDDDD, which were to be completed by January 31, 2016. The initial tune-up requirements were met and are therefore being removed from this permit altogether.

Previous Permit Condition 3.3.6 was removed from this Renewal Permit. This condition specified the initial tune-up requirements for one of the boilers under 40 CFR 63 Subpart DDDDD, which were to be completed after startup. The initial tune-up requirements were met and are therefore being removed from this permit altogether.

Previous Permit Condition 3.3.12 was removed from this Renewal Permit. This condition required the facility to comply with Previous Permit Conditions 3.3.10 and 3.3.11 (now Permit Conditions 3.3.6 and 3.3.7) at all times except as otherwise specified under 40 CFR 63 Subpart DDDD. This permit condition became no longer applicable after August 13, 2021 per the August 2020 rule update.

Previous Permit Condition 3.3.13 was removed from this Renewal Permit. This condition required the facility to maintain and implement a written SSMP under 40 CFR 63 Subpart DDDD. This permit condition became no longer applicable after August 13, 2021 per the August 2020 rule update.

IV. Testing Requirements (with Associated Record Keeping and Reporting)**A. General Testing Requirements**

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements**Federal Rule Standards**

Conditions 4.2.1 and 4.2.2 specify the performance testing requirements the Permittee must follow for the veneer dryers under 40 CFR 63 Subpart DDDD. The conditions were included in the last permit, Permit No. 2436-017-0031-V-04-0. Condition 4.2.1 has been revised slightly to reflect the changes made in the August 2020 regulation update of Subpart DDDD.

Conditions Removed From the Permit

Previous Permit Condition 4.2.3 was removed from this Renewal Permit. This condition required the Permittee to conduct an initial performance test for Veneer Dryer 3 upon startup and submit a Notification of Compliance Status to the Division within 60 days. Startup notification was received by the Division on March 8, 2017. Therefore, the permit condition has been satisfied and is being removed from this permit altogether.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

No permit amendments have been made since the last Title V renewal permit was issued on August 1, 2016 as Permit No. 2436-017-0031-V-04-0. As such, all of the permit conditions listed below were listed in that permit unless otherwise stated.

Condition 5.2.1.a requires continuous monitoring for combustion zone temperature of each of the thermal oxidizers under 40 CFR 63 Subpart DDDD. The monitoring provides a reasonable assurance that total HAP from the veneer dryers is reduced by at least 90 percent.

Conditions 5.2.2 through 5.2.5 list the requirements for the continuous parameter monitoring system, sensor device, and data handling system for the thermal oxidizer temperature monitoring under 40 CFR 63 Subpart DDDD. The requirements provide a reasonable assurance that temperature is measured properly and that compliance can be determined through the temperature records. Subpart DDDD was revised in August 2020. Permit Conditions 5.2.3 and 5.2.4 have been revised slightly to reflect the changes made in the most recent regulation update.

C. Compliance Assurance Monitoring (CAM)

Not Applicable.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

No permit amendments have been made since the last Title V renewal permit was issued on August 1, 2016 as Permit No. 2436-017-0031-V-04-0. As such, all of the permit conditions listed below were listed in that permit unless otherwise stated.

Federal Rule Standards

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

Condition 6.1.7.b.i specifies as an exceedance any time a coating that contains HAP, as defined in 40 CFR 63 Subpart DDDD, is used in operations subject to the NESHAP.

Condition 6.1.7.c.i specifies as an excursion any 3-hour block average combustion zone temperature for the Thermal Oxidizers that is below the temperature established during performance testing.

Condition 6.1.7.c.ii specifies as an excursion any failure to follow the work practice for the veneer dryers.

Condition 6.1.7.c.iii specifies as an excursion any failure to perform quality assurance checks for the thermal oxidizer monitoring systems.

40 CFR 63 Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Condition 6.1.7.d.i requires the facility to report any failure to comply with work practice standards under 40 CFR 63 Subpart DDDDD for the boilers.

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

Condition 6.1.7.d.ii is a new permit condition which requires the facility to submit any modification to the Work Practice Implementation Plan required by Condition 3.3.9.

40 CFR 60 Subpart Dc – NSPS for Small Industrial-Commercial-Institutional Steam Generating Units

Condition 6.2.1 requires the facility to record and maintain records of the amount of fuel burned in Steam Boilers 2 and 3 on a calendar month basis.

40 CFR 63 Subpart DDDDD – NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Conditions 6.2.2, 6.2.3, and 6.2.4 list the notification and periodic reporting requirements for the boilers under 40 CFR 63 Subpart DDDDD. These conditions haven't changed, but have been revised to be more specific to the facility and to add clarity on the specific schedule for each permitted boiler. All three of the boilers are natural gas fired only, and are therefore only subject to tune-ups; the permit conditions now reflect this.

Condition 6.2.5 lists the information required for the compliance report under 40 CFR 63 Subpart DDDDD. It has been revised to add that the certified statement from the responsible official must also be included.

Condition 6.2.6 lists the records the facility is required to keep.

40 CFR 63 Subpart DDDD – NESHAP for Plywood and Composite Wood Products

Condition 6.2.7 through 6.2.15 list the notification, periodic reporting, deviation reporting, and record keeping requirements for the veneer dryers and the plywood press under 40 CFR 63 Subpart DDDD. Condition 6.2.9 has been updated to remove the information regarding the dates that the initial compliance report for Veneer Dryer 3 shall cover, as that report has already been submitted. Conditions 6.2.10 through 6.2.13 and 6.2.15 through 6.2.16 have been revised slightly to reflect the changes made in the August 2020 regulation update of Subpart DDDD.

Condition 6.2.16 is a new permit condition. It is a record keeping requirement for the continuous monitoring systems. This permit condition was added per the August 2020 rule update.

Conditions Removed From the Permit

Previous Permit Condition 6.2.3 was removed from this Renewal Permit. This condition required the Permittee to submit an Initial Notification and Notification of Compliance Status for the boilers upon startup to the Division within 60 days. Startup notification for all of the boilers was received by the Division in a timely manner. Therefore, the permit condition has been satisfied and is being removed from this permit altogether.

Previous Permit Conditions 6.2.17 and 6.2.18 were removed from this Renewal Permit. These conditions required the Permittee to submit an Initial Notification and Notification of Compliance Status for Veneer Dryer 3 upon startup to the Division within 60 days. Startup notification was received by the Division on March 8, 2017. Therefore, the permit condition has been satisfied and is being removed from this permit altogether.

Previous Permit Condition 6.2.19 was removed from this Renewal Permit. This condition required the facility to update the Work Practice Implementation Plan for veneer dryers under 40 CFR 63 Subpart DDDD to include Veneer Dryer 3. An updated Plan was received by the Division on June 22, 2020. Therefore, the permit condition has been satisfied and is being removed from this permit altogether.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

See Attachment B of the permit.

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Not Applicable.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

Not Applicable.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//